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May 23, 2025

VIA ECF

Honorable Sidney H. Stein
U.S. District Judge, Southern District of New York
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St.
New York, NY 10007-1312

RECEIVED
MAY 28 2025
U.S. DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

May 28, 2025
So ordered,
Sidney H. Stein
USDS

Re: United States v. Robert Menendez, et al., Case No. 1:23-cr-00490-SHS

Dear Judge Stein:

As the Court is aware, this Firm has represented Defendant Wael Hana in the above-captioned matter. On Monday of this week, Mr. Hana surrendered to the Federal Prison Camp, Fairton, to commence the service of his sentence. There is, accordingly, no basis for his bail to remain posted and, at the request of the Office of Pretrial Services, I therefore write to request that the Court order that certain property held in connection with Mr. Hana's bail be released. Specifically, as directed by the Court, Mr. Hana previously surrendered his travel documents, such as his passport, to the Office of Pretrial Services, posted \$300,000 in cash with the Clerk's Office, pledged his interests in the entity Henry Street Plaza LLC, and posted certain personal property with counsel. *See* ECF Nos. 15, 59, 512. Now that Mr. Hana has timely surrendered to serve his sentence, he respectfully requests that the Court order the release of his travel documents from the Office of Pretrial Services, which has no objection, and of his personal property to counsel, to be transferred at Mr. Hana's direction. In addition, we respectfully request that the Court order the release of Mr. Hana's interests in Henry Street Plaza LLC and that, as previously ordered by the Court at the request of the Government, the \$300,000 be put towards Mr. Hana's upcoming fine obligation, scheduled for July 1, 2025.

If these requests are amenable to the Court, we request that the Court "so order" this letter and direct its entry onto the docket. Of course, if Your Honor has any questions or concerns with regard to this request, please do not hesitate to call me. Thank you, as always, for your consideration of this matter.

Respectfully submitted,

s/ Lawrence S. Lustberg
Lawrence S. Lustberg